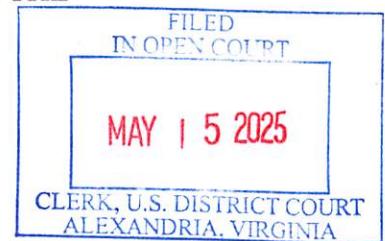


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

MOHAMMAD SHARIFULLAH,
Also known as "Jafar,"
Defendant.

Criminal No. 1:25-CR-143

COUNT ONE:

Conspiracy to Provide Material Support to a Designated
Foreign Terrorist Organization Resulting in Death
18 U.S.C. § 2339B

INDICTMENT

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

At all times material to this indictment:

The Islamic State of Iraq and ash-Sham ("ISIS") and ISIS Khorasan ("ISIS-K")

1. The Islamic State, or ISIS, is a militant group that follows a Salafi jihadist ideology based on the Sunni branch of Islam. The group presents an inherent global threat based on the extreme ideology that suggests all true Muslims have an obligation to undertake armed conflict to establish an Islamic caliphate and are sanctioned to conduct violence against leaders of Islamic or other states they declare as "kafirs" or infidels (non-believers). The movement has its origins in Iraq, growing out of its direct precursor, Al-Qaeda in Iraq (AQI).

2. On or about October 15, 2004, the United States Secretary of State ("Secretary") designated Al-Qaeda in Iraq ("AQI"), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign

Terrorist Organization (“FTO”) under Section 219 of the Immigration and Nationality Act (“INA”) and as a Specially Designated Global Terrorist (“SDGT”) under section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary amended AQI’s FTO designation under Section 219 of the INA and as an SDGT entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary also added the following aliases to the FTO listing: the Islamic State of Iraq and al-Sham (“ISIS”), the Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-‘Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furqan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO and SDGT listings: Islamic State, ISIL, and ISIS. On March 22, 2019, the Secretary added the following aliases to the FTO and SDGT listings: Amaq News Agency, Al Hayat Media Center, Al-Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO.

3. On January 14, 2016, the Secretary designated ISIL Khorasan as an FTO under Section 219 of the Immigration and Nationality Act and on January 21, 2016, as a Specially Designated Global Terrorist under section 1(b) of Executive Order 13224. The Secretary has also listed the following aliases for ISIL Khorasan: The Islamic State of Iraq and ash-Sham-Khorasan Province, Islamic State’s Khorasan Province, ISIS Wilayat Khorasan, ISIL’s South Asian Branch, South Asian chapter of ISIL, the Islamic State of Iraq and Syria-Khorasan, Islamic State of Iraq and Levant in Khorasan Province, Islamic State Khurasan, ISISK, ISIS-K (which is how the FTO will be referenced herein), and IS-Khorasan.

4. ISIS-K remains a designated FTO.

The Defendant

5. The defendant, Mohammad Sharifullah, also known as "Jafar," ("defendant") was recruited into ISIS-K in or around 2016. The defendant has at all times since then been a member of ISIS-K and has conducted activities on behalf of ISIS-K in support of multiple attacks.

The Attack on Embassy Guards in Kabul, Afghanistan on June 20, 2016

6. On June 20, 2016, a suicide bomber acting on behalf of ISIS-K detonated a bomb that killed over ten embassy guards and wounded other soldiers tasked with guarding the Canadian embassy, in addition to killing multiple civilians, in Kabul, Afghanistan.

7. ISIS issued a press release claiming responsibility for the attack, which they claimed killed guards tasked with protecting the United States Embassy. The press release stated, "Sixteen Nepalese soldiers charged with guarding the American Embassy in the city of Kabul were killed in a martyrdom-seeking operation using an explosives belt carried out by the brother 'Irfan Allah Ahmad -- may God accept him -- on a bus that was transporting them in the Banae area, praise be to God."

8. As part of his service to ISIS-K, the defendant conducted surveillance so that he could prepare the suicide bomber and transport him to the target area for this attack. ISIS-K provided the defendant and others housing and the defendant, in fact, transported the bomber to the location of the attack. The name of the bomber the defendant transported to the site of the attack was Irfan.

The Attack on Hamid Karzai International Airport ("HKIA") on August 26, 2021

9. On August 26, 2021, American and other Coalition military forces were conducting an evacuation operation at HKIA as part of a larger operation to conclude U.S. combat operations

in Afghanistan. Abbey Gate was the main entry control point for the operation. Thousands of civilians were at or near Abbey Gate on August 26 for evacuation processing.

10. At approximately 5:36 p.m. local time, a lone suicide bomber detonated an explosive device at Abbey Gate. Thirteen United States military service members were killed in the attack. Approximately 160 civilians also died in the explosion.

11. After conducting an investigation of the attack, the Department of Defense (“DOD”) concluded the suicide bomber was an ISIS-K member named Abdul Rahman al-Logari. DOD also concluded al-Logari used a body-worn improvised explosive device (“IED”) to conduct the attack.

12. The defendant had been in prison in Afghanistan from approximately 2019 until shortly before the HKIA attack. Upon release, an ISIS-K member contacted the defendant to arrange for his assistance in an upcoming attack.

13. ISIS-K members provided the defendant with a cell phone, a social media account, and a motorcycle. The defendant was tasked by ISIS-K with scouting a route near HKIA for an attacker. The defendant conducted surveillance on a route, specifically checking for law enforcement and American or Taliban checkpoints. The defendant communicated to other ISIS-K members that he believed the route was clear. They instructed the defendant to leave the area of HKIA. Later that same day, the defendant’s associates carried out the attack at HKIA described above.

The Attack at Moscow Nightclub on March 22, 2024

14. On March 22, 2024, a group of gunmen affiliated with ISIS-K attacked Crocus City Hall, a popular concert venue complex near Moscow, Russia. The attackers shot numerous victims

and set fire to the building. The attack killed approximately 130 people and injured numerous others.

15. After the attack, an ISIS spokesperson released a statement praising the attack and calling for additional attacks by “lone wolves” targeting Christians and Jewish people, especially in the United States, Europe, and Israel during the holy month of Ramadan.

16. Prior to the attack, a known ISIS-K senior leader ordered the defendant to provide instructions on how to properly use particular firearms to would-be attackers. The defendant provided those instructions to several individuals by video. Following the attack, Russian authorities arrested four gunmen in connection with the attack. The defendant recognized two of those individuals as the same people to whom he provided the firearms training video.

COUNT ONE

Conspiracy to Provide Material Support or Resources to a Designated Foreign Terrorist Organization, Resulting in Death (18 U.S.C. § 2339B)

THE GRAND JURY FURTHER CHARGES THAT:

The General Allegations above are fully incorporated here by reference.

From in or about 2016, and continuing thereafter up to and including in or about March 2025, in offenses committed outside of the jurisdiction of any particular State or district of the United States, the defendant, MOHAMMAD SHARIFULLAH, also known as “Jafar,” who was first brought to the Eastern District of Virginia, and others known and unknown to the Grand Jury did conspire to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), namely, personnel (including himself) and services, to a foreign terrorist organization—namely, ISIS-K, which at all relevant times was designated by the United States Secretary of State as a foreign terrorist organization pursuant to Section 219 of the

Immigration and Nationality Act—knowing that ISIS-K was a designated foreign terrorist organization, that ISIS-K engages and has engaged in terrorist activity, and that ISIS-K engages and has engaged in terrorism.

The deaths of Victims 1 through 13, each a citizen of the United States and a United States servicemember, as well as the deaths of over one hundred civilians, resulted from the commission of this offense.

(In violation of Title 18, United States Code, Section 2339B.)

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

17. The defendant, if convicted of the violation alleged in this indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, all of his assets, foreign or domestic.

18. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(In accordance with Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c).)

A TRUE BILL:

**Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office**

FOREPERSON OF THE GRAND JURY

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